

Pursuant 28 U.S.C. § 1746, I, Nicholas T. Moraites, hereby declare as follows:

1. I am over 21 years of age.
2. I have personal knowledge of and am competent to testify to the facts set forth herein.
3. I am an member of the law firm of Eckert Seamans Cherin & Mellott, LLC, and I am licensed to practice law in the State of Virginia and the District of Columbia. I have been admitted to the United States District Court for the District of Minnesota *pro hac vice* in the above-captioned matter. I am counsel of record for defendant, CUMIS Insurance Society, Inc (“CUMIS”).

4. Attached hereto as Exhibit A is a true and correct copy of excerpts of plaintiff's second amended privilege log.

5. Attached hereto as Exhibit B is a true and correct copy of plaintiff's responses to CUMIS's first set of document requests.

6. I declare upon penalty of perjury that the foregoing is true and correct.

Dated: Washington, DC
August 10, 2017

/Nicholas T. Moraites/